<u>REMARKS / ARGUMENTS</u>

<u>Introduction</u>

The present Amendment is in response to the Examiner's Office Action mailed November 16, 2004. Claims 1, 4, 6, 8-14, 16-18, 21, 23-34, and 30-31 are amended. Claims 1-33 are now pending in view of the above amendments.

Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in the order in which the corresponding issues were raised in the Office Action.

<u>Rejections Under 35 U.S.C. § 103</u>

The Office Action rejected claims 1-19, and 21-33 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,884,262 (*Wise*). Claim 20 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wise* in view of U.S. Patent No. 6,459,774 (*Ball*). As discussed in MPEP § 2143, the *prima facie* case of obviousness requires (i) there must be some suggestion or motivation to modify the reference or to combine reference teachings, (ii) there must be a reasonable expectation of success, and (iii) the prior art reference must teach or suggest all the claim limitations. The following discussion illustrates that neither *Wise* nor the combination of *Wise* in view of *Ball* satisfy at least one of these requirements and that the claims as presented in this paper overcome the art of record.

Wise is a reference that relates to dynamically converting standard document formats for use in an audio interface, locally or over a telephony network. *See* col. 1, lines 9-14. *Wise* teaches the following process:

> A user can call a designated telephone number and request information via DTMF signaling or through voice commands. The system analyzes the user's request, establishes a connection with a target computer network, and finds and

retrieves the requested information in a standard document file format, such as HTML which is used on the World Wide Web. The document file is analyzed by the system, and depending on the different types of structures used in the file, information is translated from an audio/visual format to an audio format and played to the user via the telephone interface. *See* col. 2, lines 5-15.

In *Wise*, a document is accessed and processed through a parser 230. *See* col. 5, lines 66-67. As the document is parsed, headings, labels, text, graphics, audio information, comments, and other types of content is identified for the call manager 210 to handle appropriately. *See* col. 6, lines 1-4. "After the entire document is processed or "read," the system may present the user with predetermined options such as repeat document, previous document, ..." *See* col. 6, lines 10-14.

Wise also teaches the ability to interact with the system throughout the speaking of audio files by the system using either DTMF signaling or voice commands or both. *See* col. 7, lines 55-57. As taught by *Wise*, DTMF or voice commands can be used "to traverse across a document, file or several files, . . . repeat a certain section of text or otherwise traverse up and down a file, . . . go back to a previously accessed file . . . ." *See* col. 7, lines 58-67.

As indicated above, *Wise* "reads" the entire document and gives a user the opportunity to perform certain commands with respect to the document. The ability to "read" the document is not dependent, however, upon a user-defined map of the document. In other words, *Wise* does not teach the ability to only "read" regions of the document that are identified in a user-defined map. Rather, *Wise* does not omit any content that can be "read" unless, for example, the user interrupts with a command. For example, *Wise* teaches that if "the command corresponds to textual content, the system will skip to the next occurrence corresponding to the command in the document." *See* col. 3, lines 2-5. Skipping through the audio content is different from omitting the content based on the user-defined map.

In contrast, the user-defined map causes only those regions of the Internet document that correspond to categories in the user-defined map to be part of the audio presentation to the user. Regions that are not included in the user-defined map are omitted. This can streamline the audio presentation and present only what the user has expressly selected.

Although the Office Action indicates that the user-profile constitutes a user-defined map, the user-profile taught by *Wise* depends on the user's personal identify and a user's identify is not associated with a region of an Internet document. *See* col. 9, lines 13-14. The user profile primarily relates to prompts that are presented to the user initially when the user in *Wise* accesses the system. The user-profile can be used to ensure that the initial prompts are those that the user regularly checks, for example. *See* col. 9, lines 2-5. The document that corresponds to the user profile is still accessed and parsed as previously described.

Further, the user profile does not appear to enable the system of *Wise* to omit regions of the Internet document. In *Wise*, the prompts presented to the user initially may be based on the user profile and the user issues commands in response to the prompts. For example, *Wise* teaches that "the user commands or signals from the user's telephone 10 are captured by the call manager 210 and sent to a translator 220 that translates the user's command from DTMF signals to a subject word or phrase, such as "Washington D.C. area weather." *See* col. 6, lines 14-18. After the subject word or phrase is passed to the Call Manager, *Wise* teaches that the subject word or phrase may match a predetermined file address, stored in memory, or send the subject word or phrase to a searcher 240. *See* col. 6, lines 35-45. Even though the user-profile can identify a predetermined file address or be used to generate a search, the document associated with the predetermined file address is parsed and the entire document is "read", as described in col. 5 line 65 to col. 6 line 15.

In contrast to the teachings of *Wise*, Claim 1 is directed to a method for creating a user-defined map. The user-defined map is distinct and separate from the Internet document that is

accessed. In claim 1, a region of the Internet document is selected. Then, a name associates the Internet document with a category in the user-defined map. Only the selected region of the Internet document is then mapped and the category associated with the selected region and included in the user-defined map only corresponds to the selected region. When the Internet document is later accessed over the telephone system, the user-defined map is used to generate an audio presentation of only the region of the Internet document that corresponds to the category in the user-defined map.

Further, one of the advantages of the user-defined map is that it enables a user to selectively omit content from Web pages that the user does not want to receive in the audio presentation. *See* specification, page 25, lines 6-7. This can be achieved, in one example, by selecting a region of the Internet document as required in claim 1. The unselected regions are not mapped to the user-defined map and therefore not included in the resulting audio presentation that is based on the user-defined map.

Further, even though the mapping process or creation of the user-defined map does require an initial investment of time, it enables a user to quickly access the selected regions of the requested document on a reoccurring basis. This ability to save time when accessing a document is not taught or suggested by *Wise* in part because *Wise* does not teach a user-defined map that controls how the Internet document is accessed.

For at least these reasons, claim 1 overcomes the art of record and is in condition for allowance. Claims 2-16 depend from claim 1 and are therefore in condition for at least this reason.

Claim 17 relates to a method for enabling a user to access an Internet document with the telephone system. In claim 17, the user-defined map includes one or more categories that are associated with particular regions of the Internet document. After prompting the user to select a

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particular category, the Internet document is retrieved and compared to the selected category to identify specific content in a particular region of the Internet document.

The user-defined map effectively includes only categories that the user wants to receive and other content is omitted. As required by claim 17, an audio representation of the specific content contained in the particular region is transmitted to the user over the telephone system.

As described above, *Wise* does not describe any mechanism to select particular regions of the Internet document. Nor does *Wise* map the selected regions of the Internet document to the user-defined map. While the user in *Wise* may be able to issue a DTMF or voice command, the entire content or at least all the content suitable for presentation over an audio connection is presented to a user. In contrast, the user-defined map omits regions of the Internet document that are not included in the user-defined map.

For at least these reasons, claim 17 overcomes the art of record and is in condition for allowance. Claims 18-23 depend from claim 17 and overcome the cited art for at least this reason.

Claim 24 has been amended to require that only regions of the Internet document associated with the user-defined map are presented to the user over the telephone system. For reasons discussed above, claim 24 also overcomes the art of record and is in condition for allowance. Claims 25-30 depend from claim 24 and overcome the art of record for at least this reason.

Claim 31 has been amended to require that unselected regions are omitted from the user-defined map and that an audio representation of the Internet document omits unselected regions when transmitting the audio representation to the user. For at least this reason and for reasons discussed above, claim 31 overcomes the art. Claims 32-33 depend from claim 31 and overcome the art for at least this reason.

Claim 20, which was rejected over *Wise* in view of *Ball* depends from a claim which, as discussed above, is believed to be allowable. For this reason, claim 20 is also believed to be in condition for allowance.

Conclusion

Applicant respectfully notes that the discussion herein should not be construed to constitute an exhaustive enumeration of the distinctions between the claims of the present application and the references cited by the Examiner. Instead, such distinctions are presented solely by way of example. Consistent with the foregoing, the discussion herein is not intended, and should not be construed, to prejudice or foreclose future consideration, by the Applicant, of additional or alternative distinctions between the claims of the present application and the references cited by the Examiner.
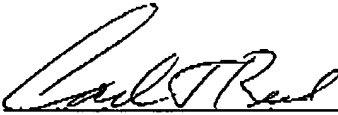
Applicant notes further that the arguments and/or amendments presented herein have been made merely to clarify the claimed invention from elements purported by the Examiner to be disclosed by the cited prior art references. Such arguments and/or amendments should not, however, be construed as an acquiescence on the part of the Applicant as to the purported teachings or prior art status of any of the cited references, nor as to any characterization of the cited references advanced by the Examiner. Accordingly, Applicant reserves the right to challenge the purported teaching and prior art status of any and all of the cited references at any appropriate time.

In light of the arguments set forth above, Applicants earnestly believe that they are entitled to a letters patent, and respectfully solicit the Examiner to expedite prosecution of this patent application to issuance.

Should the Examiner have any questions, the Examiner is encouraged to telephone the undersigned.

Respectfully submitted,

Date: ___February 16, 2005___   By: _____

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